From: Morgan Doughty mdoughty@arkansaslaw.com

Subject: Dillard et al v. City of Springdale et al Date: September 2, 2021 at 4:10 PM

To: Bob@BallingerLaw.net

Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com, mdoughty@arkansaslaw.com



Bob,

I am following up on a voicemail that I left for you yesterday. I would like to speak to you regarding your representation of Jim Bob and Michelle Duggar. It is my understanding that you lodged an objection to a subpoena duces tecum we served on the Friday Firm/Andrew Lawson. We have also served a subpoena duces tecum on Jim Bob and Michelle but have not received any response. I was hoping I could send the subpoenas to you as well as the notices for deposition. Please let me know as soon as you can, otherwise we will proceed with service on the Duggars personally.

Thank you,



Morgan S. Doughty Attorney at Law 4710 S. Thompson, Ste. 102 Springdale, Arkansas 72764

T: (479) 751-6464 F: (479) 751-3715 mdoughty@arkansaslaw.com www.arkansaslaw.com

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Date: September 2, 2021 at 4:45 PM

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Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com



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Thanks, Bob

Bob Ballinger Attorney at Law State Senator District 5 P: 479.292.1345 F: 888.505.7811 375 State Highway 215, Oark, AR 72852 www.BallingerLaw.net

Confidentiality Notice:

From: Morgan Doughty mdoughty@arkansaslaw.com Subject: Re: Dillard et al v. City of Springdale et al

Date: September 2, 2021 at 5:18 PM To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com



That would be great. I appreciate it. Am I incorrect about you lodging an objection to the subpoena duces tecum served on Andrew

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Sent from my iPhone

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From: Morgan Doughty mdoughty@arkansaslaw.com Subject: RE: Dillard et al v. City of Springdale et al

Date: September 7, 2021 at 1:09 PM
To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com, mdoughty@arkansaslaw.com



Good afternoon Bob,

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Sent: Thursday, September 2, 2021 5:19 PM

To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva < dvillanueva@arkansaslaw.com>

Subject: Re: Dillard et al v. City of Springdale et al

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Confidentiality Notice:

From: Morgan Doughty mdoughty@arkansaslaw.com Subject: RE: Dillard et al v. City of Springdale et al

Date: September 20, 2021 at 3:43 PM
To: Bob@ballingerlaw.net

Cc: Devanira Villanueva dvillanueva@arkansaslaw.com, mdoughty@arkansaslaw.com



Bob,

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Sent: Tuesday, September 7, 2021 1:09 PM

To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva <dvillanueva@arkansaslaw.com>; mdoughty@arkansaslaw.com

Subject: RE: Dillard et al v. City of Springdale et al

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From: Bob Ballinger Bob.ballinger@yahoo.com Subject: Re: Dillard et al v. City of Springdale et al

Date: September 20, 2021 at 7:20 PM

To: Morgan Doughty mdoughty@arkansaslaw.com Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com



Thanks, Bob 870.350.5175

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Confidentiality Notice:

From: Morgan Doughty mdoughty@arkansaslaw.com Subject: RE: Dillard et al v. City of Springdale et al

Date: September 21, 2021 at 4:41 PM
To: Bob Ballinger Bob.ballinger@yahoo.com

Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com, mdoughty@arkansaslaw.com



Thank you for the response. Your clients being out of town is not a problem as I will be able to set up the depositions via Zoom. Additionally, it is my understanding that my subpoena duces tecum was served, but I have not received any responses thereto. If I do not receive the requested information by the end of this week (9/24/21) I will be filing a motion for an order to show cause.

Available dates for Jim Bob and Michelle's depositions are 9/23, 9/24, 9/27, 9/28, 9/29, and 10/1.

Thank you and I look forward to hearing from you,

Morgan S. Doughty mdoughty@arkansaslaw.com

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From: Bob Ballinger <Bob.ballinger@yahoo.com> Sent: Monday, September 20, 2021 7:20 PM

To: Morgan Doughty <mdoughty@arkansaslaw.com> **Cc:** Deyanira Villanueva <dvillanueva@arkansaslaw.com>

Subject: Re: Dillard et al v. City of Springdale et al

I apologize - I have been crazy busy. The Duggars are on a month long family trip out west. Should be back mid October.

Thanks, Bob 870.350.5175

Thanks, Bob

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To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com/

Subject: Re: Dillard et al v. City of Springdale et al

That would be great. I appreciate it. Am I incorrect about you lodging an objection to the subpoena duces tecum served on Andrew Lawson?

Thank you,

Morgan S. Doughty

Sent from my iPhone

On Sep 2, 2021, at 4:45 PM, Bob@ballingerlaw.net wrote:

Mr. Doughty,

I am sorry I missed your call. Having not heard from the Duggars regarding this issue I am certainly not in a position to accept service. I will be happy to reach out to them to discuss it.

Thanks, Bob

Bob Ballinger
Attorney at Law
State Senator District 5
P: 479.292.1345
F: 888.505.7811
375 State Highway 215, Oark, AR 72852
www.BallingerLaw.net

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168 34 0 ... () 4 4 ...

From: Morgan Doughty mdoughty@arkansaslaw.com Subject: RE: Dillard et al v. City of Springdale et al

Date: September 21, 2021 at 4:41 PM
To: Bob Ballinger Bob.ballinger@yahoo.com

Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com, mdoughty@arkansaslaw.com



Thank you for the response. Your clients being out of town is not a problem as I will be able to set up the depositions via Zoom. Additionally, it is my understanding that my subpoena duces tecum was served, but I have not received any responses thereto. If I do not receive the requested information by the end of this week (9/24/21) I will be filing a motion for an order to show cause.

Available dates for Jim Bob and Michelle's depositions are 9/23, 9/24, 9/27, 9/28, 9/29, and 10/1.

Thank you and I look forward to hearing from you,

Morgan S. Doughty

mdoughty@arkansaslaw.com

P: (479)751-6464 F: (479)751-3715

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From: Bob Ballinger < Bob.ballinger@yahoo.com > Sent: Monday, September 20, 2021 7:20 PM

To: Morgan Doughty < mdoughty@arkansaslaw.com > **Cc:** Deyanira Villanueva < dvillanueva@arkansaslaw.com >

Subject: Re: Dillard et al v. City of Springdale et al

I apologize - I have been crazy busy. The Duggars are on a month long family trip out west. Should be back mid October.

Thanks, Bob 870.350.5175

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On San 20 2021 at 2:42 PM Morgan Doughty



On oop 20, 2021, at 2.301 ivi, iviorgan boughty
<mdoughty@arkansaslaw.com> wrote:

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From: Morgan Doughty < mdoughty@arkansaslaw.com>

Sent: Tuesday, September 7, 2021 1:09 PM

To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva < dvillanueva@arkansaslaw.com>;

mdoughty@arkansaslaw.com

Subject: RE: Dillard et al v. City of Springdale et al

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From: Morgan Doughty < mdoughty@arkansaslaw.com >

Sent: Thursday, September 2, 2021 5:19 PM

To: Bob@ballingerlaw.net

Cc: Deyanira Villanueva < dvillanueva@arkansaslaw.com>

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From: Bob Ballinger Bob.ballinger@yahoo.com Subject: Re: Dillard et al v. City of Springdale et al

Date: September 22, 2021 at 8:29 PM

To: Morgan Doughty mdoughty@arkansaslaw.com Cc: Deyanira Villanueva dvillanueva@arkansaslaw.com



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